



IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. 8-711
v. : DATE FILED:
ANDREW MOGILYANSKY : VIOLATIONS: 18 U.S.C. § 2423(b)
 : (traveling for the purpose of engaging
 : in illicit sexual conduct - 1 count)
 : 18 U.S.C. § 2423(c) (engaging in illicit
 : sexual conduct in foreign places - 3
 : counts)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. At all times material to this indictment, defendant ANDREW MOGILYANSKY was a dual citizen of the United States and Russia.
2. In 2002, in Russia, defendant ANDREW MOGILYANSKY became acquainted with a Russian citizen named Andrei Borisovich Tarasov, who has been charged elsewhere.
3. Defendant ANDREW MOGILYANSKY and Tarasov, together with other persons known and unknown to the Grand Jury, developed plans for a business that advertised prostitution services over the Internet on a website known as "www.berenika.org" or "Berenika." The persons advertised as prostitutes included adult and minor females. These adult and minor females were housed at an apartment in Moscow, Russia, and routinely transported to another Moscow apartment to engage in commercial sexual acts with "clients" of the business, who arranged encounters initially through the "Berenika" website.

4. Defendant ANDREW MOGILYANSKY invested money into the “Berenika” business with the expectation that he would receive a percentage of the profits derived from the commercial sexual acts of the adult and minor females engaging in prostitution.

5. As part of the business scheme, defendant ANDREW MOGILYANSKY “recruited” young minor females from an orphanage in St. Petersburg, Russia to work as prostitutes in Moscow. ANDREW MOGILYANSKY traveled from the Eastern District of Pennsylvania to St. Petersburg, Russia, to engage in sexual activity with minor females as a means of introducing them to the “Berenika” prostitution business. ANDREW MOGILYANSKY engaged in sexual activity with minor females at an apartment that he owned in St. Petersburg, Russia.

6. On or about December 1, 2003, defendant ANDREW MOGILYANSKY flew from Philadelphia, Pennsylvania, to St. Petersburg, Russia.

7. Between December 1, 2003 and January 31, 2004, Defendant ANDREW MOGILYANSKY recruited minor females, all under the age of 15, from an orphanage in St. Petersburg, Russia, to participate in the “Berenika” prostitution business.

8. Between December 1, 2003, and January 31, 2004, Defendant ANDREW MOGILYANSKY engaged in sexual activity, and attempted to engage in sexual activity, with M.S., E.K., and J.N., minor females under the age of 15 whom he recruited from the orphanage.

9. From on or about December 1, 2003 until on or about January 31, 2004, in the Eastern District of Pennsylvania and elsewhere, defendant

ANDREW MOGILYANSKY,

a United States citizen, traveled in foreign commerce for the purpose of engaging in illicit sexual conduct as defined in Title 18, United States Code, Section 2423(f), with another person, to wit,

M.S., E.K., and J.N., minor females whose names are known to the Grand Jury, in violation of Title 18, United States Code, Section 2423(b).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs one through nine of Count One are incorporated herein by reference.
2. From on or about December 1, 2003, until on or about January 31, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANDREW MOGILYANSKY,

a United States citizen, traveled in foreign commerce to Russia and, while in Russia, engaged in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, that is, M.S., a minor female whose name is known to the Grand Jury, in violation of Title 18, United States Code, Section 2423(c).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs one through nine of Count One are incorporated herein by reference.
2. From on or about December 1, 2003, until on or about January 31, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANDREW MOGILYANSKY,

a United States citizen, traveled in foreign commerce to Russia and, while in Russia, engaged in illicit sexual conduct, as defined in Title 18, United States Code, Section 2423(f), with another person, that is, E.K., a minor female whose name is known to the Grand Jury, in violation of Title 18, United States Code, Section 2423(c).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs one through eight of Count One are incorporated herein by reference.
2. From on or about December 1, 2003, until on or about January 31, 2004, in the Eastern District of Pennsylvania, and elsewhere, defendant

ANDREW MOGILYANSKY,

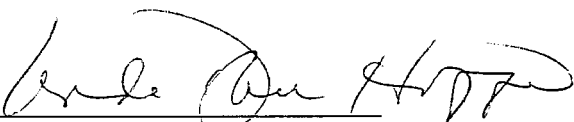
a United States citizen, traveled in foreign commerce to Russia and, while in Russia, engaged in illicit sexual conduct with another person, that is, J.N., a minor female known to the grand jury.

In violation of Title 18, United States Code, Section 2423(c).

A TRUE BILL:



FOREPERSON



LAURIE MAGID
Acting United States Attorney